

Samuel A. Schwartz, Esq.
Nevada Bar No. 10985
Bryan A. Lindsey, Esq.
Nevada Bar No. 10662
Schwartz Flansburg PLLC
6623 Las Vegas Blvd. South, Suite 300
Las Vegas, Nevada 89119
Telephone: (702) 385-5544
Facsimile: (702) 385-2741
Proposed Attorneys for the Debtor

UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Case No. 15-13475-ABL
)	
Erick Allan Lindgren,)	Chapter 11
)	
Debtor.)	Hearing Date: OST Pending
)	Hearing Time: OST Pending
)	

**MOTION FOR AN ORDER GRANTING THE DEBTOR ADDITIONAL
TIME WITHIN WHICH TO FILE SCHEDULES AND STATEMENTS**

Erick Allan Lindgren, the debtor and debtor-in-possession (the “**Debtor**”) in the above captioned case, hereby moves this Court (the “**Motion**”) for the entry of an order granting the Debtor additional time within which to file schedules and statements. In support of this Motion, the Debtor respectfully states as follows.

Jurisdiction

1. This Court has jurisdiction over this Motion under 28 U.S.C. § 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Motion is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory bases for the relief requested herein are sections 105(a) and 521 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (as amended, the “**Bankruptcy Code**”) and Fed. R. Bankr. P. 1007(a)(4) and (c).

Background

3. On June 16, 2015 (the “**Petition Date**”), the Debtor filed his voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

4. The Debtor continues to operate his business and manage his properties as a debtor-in-possession. No creditor’s committee has been appointed in this case by the United States Trustee.

Relief Requested

5. By this Motion, the Debtor seeks the entry of an Order extending the time within which the Debtor is required to file its schedules of assets and liabilities, lists of equity holders, schedules of executory contracts and unexpired leases and statements of financial affairs (collectively, the “**Schedules and Statements**”).

Basis for Relief

6. The Debtor filed this case on an emergency basis due to imminent garnishments against his earnings. Specifically, the Debtor is a professional poker player residing in Las Vegas, Nevada, and often plays in poker tournaments at the Rio All Suites Hotel and Casino in Las Vegas, Nevada (the “**Rio**”), including the upcoming World Series of Poker. Prior to the Petition Date, however, the Rio did not turn over poker earnings to the Debtor due to pending garnishments against him.

7. On the Petition Date, the Debtor filed a skeletal petition that lists only the pertinent information necessary to file this Chapter 11 case, and has not been able to assemble those pertinent documents and financial information necessary to complete the Schedules and Statements.

1 WHEREFORE, the Debtor respectfully requests that the Court enter an Order
2 (1) granting the Debtor additional time within which to file Schedules and Statements, as set
3 forth in the order attached hereto as **Exhibit A**, and (2) granting such other and further relief as
4 the Court deems appropriate.
5

6 Dated this 19th day of June, 2015.

7
8 Respectfully Submitted,

9 /s/ Samuel A. Schwartz

10 Samuel A. Schwartz, Esq.

11 Nevada Bar No. 10985

12 Bryan A. Lindsey, Esq.

13 Nevada Bar No. 10662

14 Schwartz Flansburg PLLC

15 6623 Las Vegas Blvd. South, Suite 300

16 Las Vegas, Nevada 89119

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19 Proposed Attorneys for the Debtor
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent electronically via the Court's CM/ECF system on June 19, 2015, to the following:

U.S. TRUSTEE - LV - 11 USTPRegion17.lv.ecf@usdoj.gov

I HEREBY CERTIFY that a true and correct copy of the foregoing was sent via Regular U.S. Postal Mail on June 19, 2015 to the following:

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101-7346

Ally Financial
200 Renaissance Center
Detroit, MI 48243

Clark County Treasurer
c/o Bankruptcy Clerk
500 S Grand Central Parkway
PO Box 551220
Las Vegas, NV 89155-1220

Ally Financial
P.O. Box 951
Horsham, PA 19044

Clark County Assessor
c/o Bankruptcy Clerk
500 S Grand Central Pkwy
Box 551401
Las Vegas, NV 89155-1401

Amaya Gaming
c/o Ifrah Law, PLLC
1717 Pennsylvania Ave. NW
Washington, DC 20006

Dept of Employment, Training and Rehab
Employment Security Division
500 East Third Street
Carson City, NV 89713

Andy Bloch
64 Promontory Ridge
Las Vegas, NV 89135

United States Trustee
300 Las Vegas Blvd. South #4300
Las Vegas, NV 89101

Bill Elder
2015 Lookout Point Circle
Las Vegas, NV 89117

Nevada Dept of Taxation, BK Section
555 E. Washington Ave. #1300
Las Vegas, NV 89101

Cary Katz
10100 W. Charleston Blvd.
Suite 130
Las Vegas, NV 89138

State of Nevada Dept. of Motor Vehicles
Attn: Legal Division
555 Wright Way
Carson City, NV 89711

CS RMR, LLC
c/o Frank Perez, Esq.
McCullough, Perez & Associates, Ltd.
601 S. Rancho Drive, A-10
Las Vegas, NV 89101

Erica Lindgren
1667 Tangiers Court
Henderson, NV 89012

Gabriel Hunterton
20 Hawkridge Drive
Las Vegas, NV 89135

Jason Mercier
511 SE 5th Avenue, #250
Fort Lauderdale, FL 33301

John D'Agostino
6 Villanova Court
Egg Harbor Township, NJ 08234

/s/ Janine Lee
Janine Lee

Matt Woodward
P.O. Box 867
CA 90340

Max Weinberg
1637 Braeside Lane
Northbrook, IL 60062

Nick Van NewKirk
240 East Illinois #2011
Chicago, IL 60611

Ocwen Loan Servicing
12650 Ingenuity Dr
Orlando, FL 32826